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Approval Plan for Management of Bare-Hand-Contact of Ready-to-Eat Foods

[a master template for food establishment operators]

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DHFS
DATCP

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Introduction:

Every chapter of this booklet is to be read and understood by every member of your management team (Active Management Control). This includes shift supervisors, team leaders, and senior employees who may not have a title but are occasionally left in charge of your operation.

Attachment 1 is an acknowledgment form indicating understanding of these concepts as well as the willingness and intent to comply. Every person who may serve as a **PERSON IN CHARGE (PIC)** must sign this form. **Attachment 1 is to be kept updated, readily available to your health inspector/ regulator. This document is the contract between you and the regulatory authority that performs inspections of your facility. Failure to comply with this document may result in a loss of your ability to handle ready-to-eat foods with bare hands .**

Attachment 2 is for your employees. Certain parts of this booklet are to be used as training devices for your staff. The employee and the Person in Charge shall sign Attachment 2 after all training is completed. **Attachment 2 is to be kept up to date , readily available to your health inspector/ regulator.**

Your health inspector shall have the right to make adjustments to your plan in the interest of public health. Any change needs to be documented and recorded. Make sure you and your inspector discuss the changes carefully, so that you both understand and are in agreement.

Code references in this manual refer to the Wisconsin Food Code.

Chapter 1. Hand Washing Protocol

Management shall:

1. Provide written instructions, such as an employee manual, regarding hand washing prior to handling ready-to-eat products. The instructions are to include:
 - Locations of hand wash sinks. Sinks are to be conveniently located with easy and unrestricted access, in compliance with **Chapter 2-301.15. [where]**
 - Specific instructions identifying when employees are required to wash hands, including prior to handling ready-to-eat products and other hand washing requirements identified in **Chapter 2-301.14. [when]**
 - Specific cleaning procedures in compliance with **Chapter 2- 301.12 [how]** (use attachment 3 as an example).
2. Conduct training with each employee, teaching the employee by demonstration and application exactly how and how long to wash their hands. This training shall include:
 - How to use a song, phrase, or other technique to ensure 20 second hand washing time
 - Techniques to avoid re-contamination from faucets
 - How to thoroughly remove bacteria from hands as explained in attachment 3.

Employees shall:

1. Initial the appropriate line in Attachment 2 acknowledging they have been properly trained, understand, and agree to comply with these hand-washing requirements.
2. Be able, by demonstration or description, to assure the Regulatory Authority or Health inspector/regulator that they are familiar with proper hand-washing techniques.

Chapter 2. Exclusions and Restrictions

Management shall:

1. Review the Employee Health Policies (exclusions and restrictions) requirements of **Chapter 2-201.12** (Attachment 4) with all food handlers to instruct them of the need to alert management if they are exhibiting symptoms, or have been diagnosed with infectious agents. Employees shall know that they will be removed from duties or limited to certain duties (excluded or restricted).
2. Verify the current health status of employees at the beginning of each shift by asking questions, or by other means, such as self-reporting, observation, or referral.

If an employee indicates they are ill, the manager must determine if the employee should be restricted (from handling food, clean equipment, utensils, or linens, and single service articles), or if the condition may warrant excluding the employee from the facility.

Employees shall:

1. Report symptoms such as:
 - Vomiting
 - Severe nausea (upset stomach)
 - Diarrhea (frequent loose or watery bowel movements)
 - Bloody urine or stools
 - A cut or open wound on your hands, wrists, or arms
 - Pus from a boil, infection, wound, or infected nail
 - A sore throat with persistent fever
 - Jaundice
 - Fever
2. Report known diseases, including:
 - Salmonella typhi (Salmonellosis or typhoid fever)
 - Hepatitis A Virus

- Shigella (Shigellosis)
 - E.coli 0157:H7
 - Norwalk virus
3. Inform management if they:
 - Have been diagnosed by a doctor as having a disease that may be passed by food
 - Have been excluded or restricted from preparing food by a Regulatory Authority
 4. Remember:

A person may appear to be healthy but can still spread disease through food and beverages. If you seek medical treatment for a stomach illness, you should always tell your physician you are a food handler and ask if there are any special precautions to take because of your job. If there are, get a note explaining these precautions. Your doctor will tell you if you are diagnosed with a disease that may be passed by food.
 5. Sign the appropriate block in Attachment 2 acknowledging they have been properly trained, understand, and agree to comply with these exclusion and restriction (Removal or Limitations) requirements.
 6. Be able to explain to the Regulatory Authority Health inspector/regulator that they are familiar with the symptoms, diseases, or circumstances under which they could transmit an illness.

Chapter 3. Questions and Answers

What is direct hand contact? Touching food directly with your bare hands. When you use utensils or gloves, you are NOT making direct hand contact with the food you are preparing or serving.

What are ready-to-eat (RTE) foods? *Food* that is in a form that is edible without additional preparation to achieve *food* safety, although it may be reheated for aesthetic reasons, is “RTE”. *Food* that should be cooked further, such as a rare hamburger, or a sauce containing raw eggs, can also be considered ready-to-eat provided the consumer has been advised of the potential risks. For a more detailed and comprehensive definition of RTE foods, please refer to the definitions section of the Wisconsin Food Code.

What is so hazardous about "direct hand contact with ready-to-eat foods"? The food you eat may accidentally become contaminated by very tiny particles from a person's body fluid, such as blood, pus, mucous, phlegm, fecal matter, urine, saliva, or sweat. These body fluids may also carry harmful viruses, bacteria, or parasites. If you haven't washed your hands thoroughly and recently, the “particles” are likely to be on your hands. When you touch food, the particles pass from your hands onto the food. If this food will not be cooked again before it is eaten, the harmful germs cannot be killed.

If that's the case, shouldn't we just wear gloves? The same particles that can be on the skin of your fingers and hands can also be found on gloves. If you don't wash your hands properly before

putting gloves on, or you touch something containing viral or bacterial particles with gloves on, you can still contaminate that product. Gloves are just an extension of your hands.

How can we prevent contamination from being passed by the food we prepare or serve? You can minimize contamination being passed to your customers by washing your hands, being very careful not to cross contaminate food, and by maintaining a high level of personal hygiene. Simply being aware of the potential dangers, and attempting to minimize them, is a very large step in the right direction.

What is "cross contamination"? Cross contamination happens when harmful germs or toxic residues are passed to food when the food touches another surface. For example, your hands may be the contaminated surface that passes harmful germs to the food. Studies have shown that raw chicken often contains Salmonella, and raw meats may contain E.coli. Fortunately, proper cooking kills these illness-causing agents. However, if you touch a raw meat product, with or without gloves on, then touch a ready-to-eat food without washing your hands and changing your gloves first, you have contaminated that RTE product. The same thing can happen if you use a cutting board for both raw and RTE products.

Do I have to wear gloves all the time? No. Many employees wear their gloves too much and do not change them often enough. In general, if performing the same task for an extended period of time, change gloves at least every hour. Remember that gloves are just an extension of your hand. If the gloves become soiled, they can pass contamination just as easily as unclean hands.

How often do I have to change my gloves? You must change your gloves after handling meat, fish, or poultry and before touching ready-to-eat food. You must change your gloves whenever they become torn, dirty, greasy, or contaminated. Most food service gloves are for single use. This means they can be only used for one job and must be discarded after the job is complete. You should always remove your gloves before you leave your station, and then wash your hands.

What is the "right way" to change gloves? Remove the gloves and throw in the trash can. Wash and dry your hands. Put on a clean fresh pair without touching anything else.

What about jewelry? Jewelry is prohibited because it may fall into a customer's food. Rings and bracelets may trap food particles. If you must wear a wedding ring, wear only a plain band.

When is it acceptable to contact ready to eat food with bare hands?

1. When an approved bare hand contact plan has been implemented, and;
2. When the employee has washed their hands prior to contacting food directly, and;

Managers shall:

1. Ensure that employees have read, discussed, and understand these definitions and questions.

Employees shall:

1. Be able to explain what these terms mean to Regulatory Authority Health inspector/regulators when asked (this applies only to employees routinely engaged in food handling).
2. Sign the appropriate block in Attachment 2 acknowledging they have been properly trained and understand this section.

Chapter 4. Additional Requirements

Managers shall:

1. Ensure that proper signs are located at every hand washing station reminding employees when and how to wash their hands.
2. Post prominent signs in the areas where bare hand contact with RTE foods is or is not allowed. For example, a sub sandwich shop may use direct hand contact in the final sandwich assembly area, but not at the slicer where RTE meats and cheeses are sliced and pre-portioned. Each area should have an appropriate sign reminding employees of glove use.
3. Maintain signs in break areas, near the time clock, or wherever employees congregate, reminding them of the importance of professional hygiene.
4. It is strongly recommended that each establishment create and use a daily checklist that verifies that soap, towels, and tempered water are available in every food preparation area.

Chapter 5. Bare Hand Contact Plan

The management of the facility shall create a detailed written plan, to include:
(see Attachment 5 for a sample)

- Identification of the specific food preparation areas of the establishment in which bare hand contact of RTE foods is allowed.
- An indication of any limitations to the bare hand contact in that area. For example, “all products involved in the final assembly of the sandwiches, except that raw chicken breasts and hamburger patties shall be handled using tongs or spatulas only”. If there are more than a few products that should not be handled directly, all food items should be listed individually, i.e., the following products can be directly handled (list); these products cannot (list).
- Recognition of potential cross-contamination issues, and a risk control plan to avoid them. This may include a workflow diagram.
- **The plan shall be task-specific.**

Management shall:

1. Re-evaluate the plan at least annually and more frequently if menu items change. Attachment 1 shall be re-written as evidence of the evaluation.
2. Include the plan as a part of employee orientation and training.
3. Visually observe and supervise food production (Active Management Control) to ensure compliance by all staff.

4. Discuss and review the plan with the regulator at the inspection.

This plan shall be kept on file and readily available to the Regulatory Authority Health inspector/regulator at any time.

Employees shall:

1. Review and discuss the plan with management to ensure understanding.
2. Sign the appropriate block in Attachment 2 acknowledging they have been properly trained and understand this section.
3. Be able to explain to the regulator which products in their stations can or cannot be handled with bare hands.

Chapter 6: Implementing the Plan

You must notify your Regulatory Authority Health inspector/regulator, via telephone or in writing, when you are ready to implement your bare-hand-contact plan. Your inspector may choose to come out immediately to verify compliance, or may choose to wait until the next scheduled inspection. It is not required that “permission” be given, because this is not a variance, it is an approval. As long as you are meeting all the conditions and stipulations, your plan is “approved”.

What happens if we violate our plan?

The food code requires that you not touch ready-to-eat food with bare hands except as approved by the Regulatory Authority. Your plan is your approval. If you fail to abide by your plan, it is a violation (in this case a “critical”) of the food code, and will be treated as any other critical violation. Depending upon the jurisdiction in which your establishment is located, this may result in a required re-inspection that may or may not incur an additional fee. Continued failure to comply could result in fines or citations, court appearances, or a loss of license.

Attachment 1: Person in Charge Agreement

My signature below indicates the following:

1. I have reviewed and understand the bare-hand contact plan for _____ (establishment name).
2. I acknowledge that it is my duty and responsibility to ensure compliance with this plan at all times.
3. I realize that the Wisconsin Food Code requires that gloves, tongs, spatulas, or other utensils are to be used when handling ready-to-eat (RTE) products *except as otherwise approved by the Division of Public Health or the Division of Food Safety*.
4. I recognize that this plan, when properly followed, constitutes such approval.
5. I understand that failure of _____ (establishment name) to comply with this plan will result in critical violation(s) being marked on the inspection.
6. I realize that it is the responsibility of the individual health/regulatory inspector to verify our compliance with this plan, and that the inspector has the right to request changes in the interest of public health and that the inspector needs to document any needed changes.
7. I understand that continued non-compliance could result in charged re-inspections, citations, fines, or loss of license to operate, or other punitive actions.

Print Name	Title	Date	Signature
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Attachment 2: Employee Training Checklist

Employee Name _____ Date _____

My signature below indicates that, for each item checked, I have received training, I understand the issue, and I agree to comply.

___ Chapter 1: Hand Washing Protocol

___ Chapter 2: Exclusions and Restrictions

___ Chapter 3: Questions and Answers

___ Chapter 5: Bare-Hand Contact Plan

Signature of Employee

Signature of Manager

Attachment 3: Hand Washing and Hygiene

WISCONSIN FOOD CODE FACT SHEET

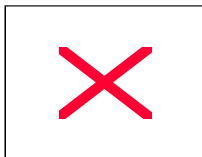
~~~~~ HAND WASHING ~~~~~

Hand washing is the single most effective means of preventing the spread of bacteria and viruses, which can cause infections and food borne illness.

Employees can be a significant source of harmful microorganisms. Proper hand washing can be the most effective action workers can take to control direct and indirect contamination of food, utensils, and equipment.

When To Wash Hands

- Before starting to work with food, utensils or equipment.
- During food preparation, as needed.
- When switching between raw foods and ready-to-eat foods.
- After handling soiled utensils and equipment.
- After coughing, sneezing, using a tissue, or using tobacco products.
- After eating and drinking.
- After touching your skin.
- After handling animals.
- After using the toilet, wash hands at a hand wash sink in the bathroom: and again when returning to work.



Always Follow These Six Steps When Hand Washing

Before washing your hands, remove any jewelry and only wash your hands in sinks designated for hand washing. Do not wash your hands in utensil, food preparation, or service sinks.

1. Roll up sleeves and wet hands with warm water.
2. Using soap, not a hand sanitizer solution, work up a soapy lather that covers hands and forearms.
3. Rub hands together for at least 20 seconds: make sure to wash palms, back of hands, between fingers, and forearms.
4. Use a fingernail brush to clean under fingernails and between fingers.
5. Rinse hands and forearms in warm water.
6. Dry hands with single-use paper towels or cloth roller towel. Turn off the faucet with paper towels to prevent re-contamination of hands.

WISCONSIN FOOD CODE FACT SHEET

EMPLOYEE HYGIENE

Importance of Proper Hygiene:

Employees are the most important link in preventing food borne illness. Good personal hygiene, including proper and frequent hand washing, is one of the best ways to prevent food borne illness.

Hand washing:

Always make sure that hands are washed and thoroughly dried before starting work, between tasks, before working with food products, equipment, utensils, and linens, after using the toilet room, coughing, sneezing, eating, drinking or smoking, etc. Correct hand washing includes cleaning the backs of hands, palms, and forearms, between fingers and under the fingernails using warm water, soap, and a fingernail brush.

Cuts, Wounds, and Sores:

Any cuts, wounds, or open sores on the hands and arms must be completely covered by a waterproof bandage. Wear single-use gloves or finger cots over any bandages on the hands and fingers.

Hair Restraints:

Food employees are required to wear hair restraints such as hairnets, hats, scarves, or beard nets that are effective in keeping their hair in control. This does not apply to counter staff who serve only drinks or wrapped food products, and wait staff or hostesses if they present a minimal risk of contamination.

Proper Work Clothing:

All food employees must wear clean outer clothing to prevent contamination of food, equipment, utensils, linens, and single-service and single-use articles.

Personal clothing and other personal items must be kept away from food handling and storage areas. Employers must provide adequate storage areas for employee's personal belongings. If employees routinely change clothing at the establishment, a room or area must be designated and used for that purpose. Such changing areas must be separate from food, clean equipment and linen.

Wearing of Jewelry:

Jewelry should be limited to plain-banded rings only. Necklaces, bracelets, earrings, and other jewelry should not be worn when preparing or serving food.

Eating, Drinking and using Tobacco:

All employees shall eat, drink, or use tobacco only in designated areas where contamination to food, equipment, utensils, etc. can not result.

Attachment 4: Exclusions and Restrictions (Removal from Duties or Limitation of Duties)

2-201.12 Exclusions and Restrictions.^C

The PERSON IN CHARGE shall:

excluding ill employees

(A) Exclude a FOOD EMPLOYEE from a FOOD ESTABLISHMENT if the FOOD EMPLOYEE is diagnosed with an infectious agent specified under ¶ 2-201.11(A);

*restricting employees:
(serving general population)*

(B) Except as specified under ¶ (C) or (D) of this section, restrict a FOOD EMPLOYEE from working with exposed FOOD; clean EQUIPMENT, UTENSILS, and LINENS; and unwrapped SINGLE-SERVICE and SINGLE-USE ARTICLES, in a FOOD ESTABLISHMENT if the FOOD EMPLOYEE is:

· *with symptom of illness or of past illness*

(1) Suffering from a symptom specified under ¶ 2-201.11(B), or

(2) Not experiencing a symptom of acute gastroenteritis specified under Subparagraph 2-201.11(B)(1) but has a stool that yields a specimen culture that is positive for ***Salmonella Typhi***, ***Shigella*** spp., *Shiga toxin-producing E. coli* spp., or other pathogens which can be transmitted through FOOD;

*excluding employees:
(serving high-risk population)*
· *with symptom of illness or of past illness*

(C) If the population served is a HIGHLY SUSCEPTIBLE POPULATION, exclude a FOOD EMPLOYEE who:

(1) Is experiencing a symptom of acute gastrointestinal illness specified under Subparagraph 2-201.11(B)(1),

(2) Is not experiencing a symptom of acute gastroenteritis specified under Subparagraph 2-201.11(B)(1) but has a stool that yields a specimen culture that is positive for ***S. Typhi***, ***Shigella*** spp., *Shiga toxin-producing E. coli* spp., or other pathogens which can be transmitted through FOOD

(3) Had a past illness from ***S. Typhi*** within the last 3 months, or

(4) Had a past illness from ***Shigella*** spp. or *Shiga toxin-producing E. coli* spp. within the last month; and

excluding and restricting jaundiced employees

(D) For a FOOD EMPLOYEE who is jaundiced related to Hepatitis A:

(1) If the onset of jaundice occurred within the last 10 calendar days, exclude the FOOD EMPLOYEE from the FOOD ESTABLISHMENT, or

(2) If the onset of jaundice occurred more than 30 calendar days before:

(a) Exclude the FOOD EMPLOYEE from a FOOD ESTABLISHMENT that serves a HIGHLY SUSCEPTIBLE POPULATION, or

(b) Restrict the FOOD EMPLOYEE from activities specified under ¶ 2-201.12(B), if the FOOD ESTABLISHMENT does not serve a HIGHLY SUSCEPTIBLE POPULATION.

Attachment 5: Sample Plan

“Nieces” is a small sandwich shop operating in several large metropolitan areas. They bake their own bread daily, buy their meats and cheeses and vegetables in bulk, and cook a few menu items from scratch. Their operation can be broken down into 3 parts:

- Bread preparation
- Pre-prep
- To-order sandwich prep.

They are requesting bare hand contact of RTE ingredients during the “to-order sandwich prep” stage. This will include bare hand contact with the bread. It does NOT include bare hand contact with RTE foods during the slicing and portioning stages. Here is their plan:

Establishment: Nieces
Address: 1234 Anystreet
TeeTotaler, WI 53333
Phone: 888-777-6543
Date of Plan January 21, 2002
Person in Charge: Susan Niece
Title: General Manager

Work station location, purpose, or description:

The sandwich table is located on the front line, and includes the bread racks located near the table.

Products included

*Roast Beef
Turkey
Ham
Sliced Cheese
Sliced raw vegetables
Sub and sandwich rolls (on bread rack)*

Products excluded

*Rib Eye Steaks
Chicken Breasts*

Add any additional description of product or process as needed

N/A

Describe any potential cross-contamination issues, and how you will prevent/ avoid them:

There are 2 products held in this table that are not RTE. These consist of pre-portioned ribeye steaks, and raw chicken breasts. These items are cooked on the small grill. They will be handled only with tongs that are to be used exclusively for those products only.

Attachment 5: Sample Plan (continued)

All production employees will wash their hands thoroughly before assuming their work stations. Once in place, these workers will never touch a raw product, nor will they handle money. The hand wash station is conveniently located so additional hand washing can occur as needed.

The only deviation from this plan may occur during slow between-meal times, when only one employee may be in this area. In that case, hand washing will always occur between handling money and touching any RTE food.

Attachment 6. Work Plan Worksheet

Bare Hand Contact Plan

(This plan shall be updated at least annually, or whenever a personnel or menu change occurs that impacts this plan).

Attachment 6 is to be maintained in a current state, readily available to your health inspector/ regulator.

Establishment: _____
Address: _____

Phone: _____
Date of Plan _____
Person in Charge: _____
Title: _____

On the next page, list or describe the products that are to be included in the bare-hand-contact plan. This must be a detailed list, including all the items allowed to be handled with bare hands. Also describe exactly where this will occur (what workstation?). Your employees and your health inspector should easily understand your plan. Your health inspector can issue citations or refer your establishment for legal action if you fail to comply with it. Use additional copies if necessary.

Work station location, purpose, or description:

_____ (Draw a diagram on the
back of this page if needed for clarification)

Products included

Products excluded

Add any additional description of product or process as needed

Describe any potential cross-contamination issues, and how you will prevent/ avoid them:

(make copies of this page)